

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

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PLEASRDAO, an exempted foundation
company,

Plaintiff,

Case No.: 1:24-cv-4126-PKC-MMH

-against-

MARTIN SHKRELI,

Defendant.

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**NOTICE OF MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR
DEFENDANT**

PLEASE TAKE NOTICE, that upon the annexed Affirmation of Serge Krimnus, Esq., dated September 30, 2025, Serge Krimnus, Esq. shall move this Court, before the before the Hon. Pamela K. Chen, United States District Judge, at the United States Courthouse for the United States District Court for the Eastern District of New York, located at 225 Cadman Plaza East Brooklyn New York 11201, Courtroom 4F, at a date and time to be determined by the Court, for an Order, pursuant to Local Rule 1.4, relieving Serge Krimnus, Esq. and Bochner PLLC as counsel of record to Defendant Martin Shkreli, together with such other and further relief as this Court may deem just and proper.

Dated: September 30, 2025
New York, New York

Respectfully Submitted,

By: /s/ Serge Krimnus
Serge Krimnus, Esq.
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